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and the Proposed Class*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

RICHARD KADREY, et al.,

*Individual and Representative Plaintiffs,*

v.

META PLATFORMS, INC.,

*Defendant.*

Case No. 3:23-cv-03417-VC

**DECLARATION OF MAXWELL V. PRITT  
IN SUPPORT OF PLAINTIFFS' MOTION  
FOR RELIEF FROM NON-DISPOSITIVE  
PRETRIAL ORDER OF MAGISTRATE  
JUDGE**

I, Maxwell V. Pritt, declare as follows:

1. I am an attorney duly licensed to practice in the State of California. I am a partner in the San Francisco, California office of Boies Schiller Flexner, LLP (“BSF”), counsel for Plaintiffs in the above-captioned action. I have personal knowledge of the matters stated herein and if called upon, I can competently testify thereto. I make this declaration pursuant to 28 U.S.C. Section 1746 in support of Plaintiffs’ Motion for Relief From Non-Dispositive Pretrial Order of Magistrate Judge.

2. Attached to this Declaration as **Exhibit A** is a true and correct copy of a document Bates stamped Meta\_Kadrey\_00238287, in the format reproduced by Meta on October 8, 2025.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 8th day of October 2025 in New York, NY.

By:

/s/ Maxwell V. Pritt  
Maxwell V. Pritt